

RESOLUTION OF COMMENTS ON DRAFT REPORT

**CCW IMPOUNDMENT ASSESSMENT
WILLIAM CRAWFORD GORGAS ELECTRIC GENERATING PLANT
WALKER COUNTY, ALABAMA**

RIZZO PROJECT No. 09-4157

**PREPARED FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNDER SUBCONTRACT TO LOCKHEED MARTIN**

**UNITS ASSESSED:
RATTLESNAKE DAM AND ASH POND
GYPSUM PONDS**



Two comments were received from EPA on the Draft Assessment Report for the Alabama Power Company Gorgas Electric Generating Station.

Six comments were received from Alabama Power Company

No comments were received from State Agencies.

Copies of comments received are included in this document.

Resolution of Comments Received. Comments are in ***Italics*** – our resolution actions are in Regular Font

Resolution of Comments from EPA

1. ***“Eliminate “Department of” EPA (should just be U.S. EPA on cover sheet and all other such references.”***

This error was corrected in the Final Report.

2. ***“Make more clear what reports/documents/etc. were reviewed. Were any geotech, liquefaction, stability analyses, etc. conducted/reviewed?”***

A section, “Engineering Information” containing a list of documents provided by Alabama Power Company and more detail on the slope stability and hydrologic analyses reviewed is included in the Final Report.

Resolution of Comments from Alabama Power Company

1. ***“Section 1.2 lists the organizations present at the inspection. Southern Company personnel were also present (see Sections 1.61 and 3.1)”***

Section 1.2 was corrected as requested.

2. ***“APC has not definitively quantified the source of the small pool at the toe of the dam as referenced in Section 1.2, but APC believes it is influenced by both seepage and the adjacent river.”***

Section 1.2 was revised to reflect this comment and to state concurrence with the assumption about the source of the water in the pond.

3. ***“The ^{redacted} inspections referenced in Sections 1.3 and 3.2 are performed by technical dam safety experts employed by Southern Company Services rather than APC personnel.”***

These Sections were revised to reflect these facts.

4. ***“Regarding the frequency of ^{redacted} by plant personnel as referenced in Section 2.2.2, it is the policy of APC that such inspections occur on no less than a ^{redacted} .”***

Section 2.2.2 was revised.



5. *“Regarding the engineering inspection referenced in Section 2.2.2, the monument survey and the inspection by dam safety experts occur independently of one another. The dam safety inspectors review the survey data as part of their inspection evaluation.”*

Section 2.2.2 was revised to reflect these facts.

6. *“The name of Steven Burns is misspelled at Sections 1.6.1 and 3.1.”*

These Sections were corrected.

Grady Adkins

From: Killeen, Deborah A [deborah.a.killeen@lmco.com]
Sent: Wednesday, July 22, 2009 9:54 AM
To: John Osterle
Cc: Grady Adkins; Miller, Dennis A; Hoffman.Stephen@epamail.epa.gov; Kohler.James@epamail.epa.gov
Subject: FW: Comments on RIZZO's Draft Assessment Report for: Gorgas Steam Plant

John,
Good Morning,

Here are EPA's comments on RIZZO's Draft Assessment Report for: Gorgas Steam Plant:

- 1) Eliminate "Department of" EPA (should just be U.S. EPA) on cover sheet and all other such references.
- 2) Make more clear what reports/documents/etc. were reviewed. Were any geotech, liquifaction, stability analyses, etc. conducted/reviewed?

Deborah A Killeen
Quality Assurance Officer
Lockheed Martin/REAC
732-321-4245 (office)
609-865-9308 (cell)
732-494-4021 (fax)

Grady Adkins

From: Killeen, Deborah A [deborah.a.killeen@lmco.com]
Sent: Thursday, September 03, 2009 10:01 AM
To: Grady Adkins
Cc: Hoffman.Stephen@epamail.epa.gov; Kohler.James@epamail.epa.gov; Miller, Dennis A
Subject: FW: Alabama Power Company Comments on Gorgas Steam Plant Draft Report

Attachments: Scan001.PDF



Scan001.PDF (28 KB)

Grady,

Attached please find the facility's comments on the Alabama Power Gorgas plant.

Deb

Deborah A Killeen
Quality Assurance Officer
Lockheed Martin/REAC
732-321-4245 (office)
609-865-9308 (cell)
732-494-4021 (fax)

-----Original Message-----

From: Kohler.James@epamail.epa.gov [mailto:Kohler.James@epamail.epa.gov]

Sent: Thursday, September 03, 2009 9:07 AM

To: Miller, Dennis A; Killeen, Deborah A

Cc: Hoffman.Stephen@epamail.epa.gov

Subject: Alabama Power Company Comments on Gorgas Steam Plant Draft Report

Dennis and Deb:

Attached are the Alabama Power Company's comments on the Gorgas Steam Plant Draft Report. We have reviewed the comments and believe they are limited to factual/editorial issues. They should be verified and incorporated accordingly.

Should you disagree or choose not to address/incorporate any comments into the report, please draft a response that explains why.

Also: remember not to finalize any reports until we inform you that all comments (from EPA/state/company) have been received. Please do not call the companies directly; we can coordinate questions on the comments with EPA.

If you have any questions or concerns with these directions please feel free to call me or Steve. Thanks!

Jim

Jim Kohler, P.E.
Environmental Engineer
LT, U.S. Public Health Service
U.S. Environmental Protection Agency

Office of Resource Conservation and Recovery

Phone: 703-347-8953

Fax: 703-308-8433

----- Forwarded by James Kohler/DC/USEPA/US on 09/03/2009 09:03 AM -----

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| Stephen Hoffman/DC/USEPA/US |
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| To: |
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| James Kohler/DC/USEPA/US@EPA |
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| Fw: Alabama Power Company - Gorgas Steam Plant - Comments on Draft |
Report |

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----- Forwarded by Stephen Hoffman/DC/USEPA/US on 09/01/2009 08:45 AM -----

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| From: |
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| "Bowden, Matthew W." <MWBOWDEN@southernco.com> |
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Sent: Tuesday, August 25, 2009 8:48 AM
To: Bowden, Matthew W.
Cc: Kohler.James@epamail.epa.gov
Subject: Alabama Power Company - Gorgas Steam Plant

On June 9-10, 2009, USEPA conducted a site assessment study of coal combustion waste management units at the Alabama Power Gorgas facility.
I am requesting that you review and comment on this draft report which can be down loaded at the site noted below. I would appreciate it if you would send me your comments no later than 5 days from the receipt of this email. This draft report will also be sent to the state. After EPA receives all comments, a final report will be prepared and released to the public. If you have any questions about this effort, please call me at 703-308-8413. Please acknowledge receipt of this email.

Alabama Power Company - Gorgas Steam Plant

<http://www.sendspace.com/file/ppqh0b>

Stephen Hoffman
Office of Resource Conservation and Recovery (5304P) U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW Washington, D.C. 20460 hoffman.stephen@epa.gov
703-308-8413 fax 703-308-0514

over overnight package delivery:
2733 Crystal Drive, 5th Floor
Arlington, Va. 22202

(See attached file: Scan001.PDF)

August 31, 2009

Mr. Stephen Hoffman
Office of Resource Conservation and
Recovery (5304P)
U.S. Environmental Protection Agency
2733 South Crystal Drive, Fifth Floor
Arlington, Virginia 22202

Re: Draft Dam Safety Inspection Report for Plant Gorgas

Dear Mr. Hoffman:

On August 25, 2009, the U.S. Environmental Protection Agency ("EPA") provided to Alabama Power Company ("APC") a draft report regarding certain facilities for the management of coal combustion byproducts at APC's Plant Gorgas ("Draft Report"). The Draft Report was prepared by Paul C. Rizzo Associates, Inc. ("Rizzo") and was dated July 2009. This letter provides the comments of APC.

APC is generally satisfied with the content and conclusions of the Draft Report. The report concludes that the units inspected are in "satisfactory" condition, which is the most favorable category. We also understand the potential hazard rating to be based exclusively on the consequences of a failure of a structure, not the likelihood of such an event. The Draft Report includes five recommendations regarding inspections and maintenance of vegetation. APC has reviewed its inspection and maintenance practices to ensure they include the items noted in all of the Draft Report's recommendations.

In addition, APC provides the following comments on various discrete issues. Section 1.2 lists the organizations present at the inspection. Southern Company personnel were also present (see Sections 1.6.1 and 3.1). APC has not definitively quantified the source of the small pool at the toe of the dam as referenced in Section 1.2, but APC believes it is influenced by both seepage and the adjacent river.

redacted

August 31, 2009
Page 2

redacted

redacted | The name of
Steven Burns is misspelled at Sections 1.6.1 and 3.1.

Thank you for this opportunity to comment. Please direct any future correspondence on this issue to me.

Sincerely,



Matthew W. Bowden
Vice President
Environmental Affairs